

EXHIBIT A



*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

October 16, 2020

REQUEST TO BE FILED UNDER SEAL

BY EMAIL

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Ali Sadr Hashemi Nejad, 18 Cr. 224 (AJN)

Dear Judge Nathan:

On September 16, 2020, the Court issued an Opinion and Order (the "Order") directing four of the prosecutors who worked on the above-captioned case and the two unit chiefs who supervised the case to submit declarations in response to the questions and issues discussed in the Order, and to attach "any record" of certain internal communications. (Dkt. 379 at 32).

I understand that the unit chiefs and other prosecutors plan to request that the Court maintain under seal all declarations and internal communications submitted in response to the Order. I respectfully request to be included in this application.

In light of the anticipated sealing application, I respectfully submit my declaration, dated October 16, 2020, by email to the Court, to the Associate United States Attorney, and to the defense. In my declaration, I use the same naming conventions used by the Court in its Order. Should the Court prefer a version of the declaration with full names, I will promptly provide one.

With respect to the production of internal communications, I am providing a CD by hand delivery directly to the Court and to the Associate United States Attorney, and by overnight mail to the defense, given the anticipated sealing application, the volume of communications, the private content unrelated to the case included therein, and potential redactions.

Respectfully submitted,

Jane Kim
Assistant United States Attorney

cc: John McEnany, Associate United States Attorney, and Defense Counsel (by Email)

Enclosures